

EXHIBIT A
(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

**OMNIBUS ORDER AUTHORIZING TRUSTEE TO FILE CERTAIN CERTIFICATES
OF SERVICE, EXHIBITS OR OTHER ATTACHMENTS UNDER SEAL**

Upon the Application (“Application”) of the Trustee for an omnibus order, pursuant to and sections 105(a) and 107(c) of the Bankruptcy Code and Bankruptcy Rule 9018, authorizing the Trustee to file under seal those certificates of service, exhibits or other attachments to motions (the “Accompaniments”) that list the name and/or contact information of any Former Employee of the Debtor; and the Court having reviewed the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief requested therein; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to section 78eee(b)(4) of SIPA, 28 U.S.C. §§ 157 and 1334; and venue being proper in this district pursuant to section 78eee(b)(4) of SIPA and 28 U.S.C. §§ 1408 and 1409; and it appearing that no notice of the Application is necessary; it is hereby,

ORDERED, that the relief requested in the Application is granted; and it is further
ORDERED, that the Trustee may file the Accompaniments under seal pursuant to

sections 105(a) and 107(c) of the Bankruptcy Code and Bankruptcy Rule 9018.

Dated: New York, New York
November ___, 2009

HONORABLE BURTON R. LIFLAND

UNITED STATES BANK